



IRA HELLER LAW, LLC

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January 29, 2025

VIA ECF FILING

United States Magistrate Judge Stacey D. Adams
Frank R. Lautenberg U.S. Post Office & Courthouse Building
2 Federal Square
Newark, NJ 07102

Re: John Doe v. Baila Sebrow
United States District Court, District of New Jersey
Case No.: 2:21-cv-20706
Response to January 28, 2025 Letter from Daniel Szalkiewicz, Esq.

Dear Judge Adams,

As Your Honor is aware, my Law Office represents the Defendant, Ms. Betty Sebrow, in the above referenced matter. I write this letter in response to a letter submitted to the Court by Mr. Daniel Szalkiewicz, counsel to the Plaintiff, on January 28, 2025.

As per Mr. Szalkiewicz's letter, he requests that one of the exhibits attached to my Response Certification, filed on January 27, 2025, be sealed. His stated reason for this request is that the exhibit violates the pseudonym order issued by Judge Kiel, which prohibits the filing of any document containing the Plaintiff's name or any indication of his identity. The exhibit in question is an Order recently issued by the Hon. Judge Joshua Sanders of the Essex County Family Court, in which the Judge refers to the Plaintiff using only his initials. However, given that Judge Sanders, in issuing an Order in a domestic violence matter, deemed the use of initials an acceptable means of protecting a litigant's privacy, I freely assumed that such a reference to the Plaintiff would not constitute a violation of the pseudonym order in this matter.

However, if Your Honor determines that the use of initials presents an issue, I will promptly take the necessary steps to rectify the situation. My primary concern is determining the most appropriate method to address it, as I am not sufficiently familiar with the ECF filing system to ascertain the best approach. Should Your Honor deem a redaction to be necessary, I will readily redact Exhibit #8 and resubmit it. As I see it, there are two possible options: (1) Resubmitting the entire filing, with the prior version being removed from the ECF system; or (2) Replacing only Exhibit #8, if the Court has the ability to swap the file with a redacted version. I will gladly proceed with whichever method Your Honor deems most preferable and feasible.

I await Your Honor's directions. Thank you!

Respectfully submitted,

Ira W. Heller, Esq.

cc: Daniel Szalkiewicz, Esq.
Attorney for Plaintiff
Cali Madia, Esq.
Attorney for Plaintiff